

REMARKS/ARGUMENTS

I. Concerning the Amendments

The specification is amended to specifically include the subject matter of Claim 7 after correction of the typographical error.

Claim 7 is amended in order to correct a clear typographical error. Claims 14-17, 21-24, and 54-56 are amended to depend from Claim 8.

Claim 5 is canceled in view of the fact that its subject matter is included in Claim 6. Claims 2, 6, 19 and 31 are amended to comply with antecedent basis requirements without changing the scope of their coverage. Claims 57 and 62 are canceled, as the subject matter of these claims is incorporated into Claims 1 and 30, respectively, by amendments presented herein. The amendments to Claims 1 and 30 are believed to distinguish the subject matter of those claims from the teachings of Yokota.

II. Concerning the Rejection under 35 U.S.C. 112, First Paragraph

Claim 7 stands rejected under 35 U.S.C. 112, first paragraph as failing to comply with the enablement requirement. The amendment to Claim 7 presented herein is believed to obviate the basis for this rejection.

III. Concerning the Rejection under 35 U.S.C. 112, Second Paragraph

Claims 2, 3, 5, 6, 14-17, 19, 21-24, 31, 33, 34, 54-56, 66, 67, 70, and 71 stand rejected as being indefinite. The cancellation of Claim 5 and the amendments presented herein to Claims 2, 6, 14-17, 19, 21-24, 31, and 54-56 are believed to obviate the basis for the rejection of these claims under the second paragraph of 35 U.S.C. 112.

Regarding Claims 66 and 70, the scope of Claim 1 covers a curtain which can be a single layer curtain or a multi-layer curtain. Claims 66 and 70 merely specify that at least one layer of the curtain comprises polyethylene oxide. When the curtain has only one layer, then the polyethylene oxide would be in that layer. When the curtain has more than one layer, the polyethylene oxide could be in any layer of the curtain, or more than one layer of the curtain, according to Claims 66 and 70.

Claims 67 and 71 are rejected as Examiner finds the term "interface layer" to be confusing. The interface layer is described, inter alia, at page 11 lines 10-11. The interface layer is the layer that comes in contact with the substrate to be coated. In the case of a single layer curtain, that single layer is the interface layer, as it is the layer that comes in contact with the substrate to be coated. Every curtain of Claims 1 and 30 will have an interface layer. Accordingly, as a practical matter, applicants believe there is no antecedent basis issue since each curtain must have an interface layer.

IV. Concerning Examiner's Comments on Priority

Applicants reserve the right to comment on the subject of priority, should it become an issue.

V. Concerning the Rejections Over Prior Art

Claims 1-6, 8, 9, 12, 13, 16-22, 25, 30-35, 38-44, 47, 50, 53, 65-67 and 69-71 stand rejected under 35 USC 102(a) as being anticipated by Yokota.

Claims 11, 14, 15, 23, 24, 26, 36, 37, 45, 46, 48 and 73 stand rejected under 35 USC 103(a) as being obvious over Yokota.

Claim 10 stands rejected under 35 USC 103(a) as being unpatentable over Yokota further in view of JP 11-192777.

Claims 10 and 72 stand rejected under 35 USC 103(a) as being obvious over Yokota further in view of Hanaki.

Claim 74 stands rejected under 35 USC 103(a) as being obvious over Yokota further in view of Asano.

Applicants respectfully submit that the amendments presented herein to independent Claims 1 and 30 obviate the basis of these rejections. Specifically, Claims 1 and 30 are amended herein to indicate that the moving substrate has a web velocity of at least about 400 meters per minute. In contrast, Yokota has no generic teaching regarding the velocity of the web substrate, and his examples are conducted at application rates of 200 meters per minute and 40 meters per minute. The secondary references applied in the foregoing rejections do not solve this deficiency. Accordingly, it is respectfully submitted that Yokota, either alone or in combination with the secondary references, neither teaches nor suggests the subject matter of Applicants' claims.

Claims 27, 49, 54-64 and 68 stand rejected under 35 USC 103(a) as being obvious over Yokota further in view of Schweizer.

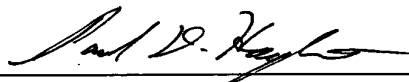
Applicants respectfully submit that neither Yokota nor Schweitzer contain any teaching that would motivate one of ordinary skill in the art to combine their teachings. While both references fall within the general field of paper coating, they are disconnected references that do not provide the skilled artisan any motivation to combine their teachings.

Even if, hypothetically speaking, the references could be combined, the combination of Yokota and Schweitzer does not support a prima facie case of obviousness. For a reference to be effective, it must be enabling. Applicants submit that the Schweitzer reference is a non-enabling reference. While the Schweitzer reference in Table 1 contains broad teaching regarding the web velocity, number of layers and other variables encountered in the pre-metered coating process, it contains no examples or other teaching regarding how high web velocities could be obtained. Schweitzer is a purely speculative article. It states a dream, but does not give any details about how the dream could be realized. Evidence of this is contained in the following quotation from Schweitzer: "The possibility of simultaneous multilayer coating, in particular, has recently attracted great interest." (Emphasis supplied.) As further stated by Schweitzer: "Caution should therefore be used in interpreting Table 1." For the foregoing reasons, reconsideration of the rejections is respectfully requested.

VI. Conclusion

Reconsideration of the claims and passing of the application to allowance are solicited.

Respectfully submitted,



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